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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

D-1 Jaquez Collins,
D-2 Ockeion D. Perry,

Defendants.

Case: 4:24-cr-20436
Judge: Behm, F. Kay
MJ: Ivy, Curtis
Filed: 08-07-2024
IND USA v. COLLINS, et al (tt)

Violations:

18 U.S.C. § 922(o)(1)
18 U.S.C. § 924(c)(1)(A)
21 U.S.C. § 841(a)(1)

FILED
AUG 07 2024
U.S. DISTRICT COURT
FLINT, MICHIGAN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Illegal Transfer and Possession of a Machinegun
18 U.S.C. §§ 922(o)(1) and 2**

D-1 Jaquez Collins
D-2 Ockeion D. Perry

1. On or about October 10, 2023, in the Eastern District of Michigan, defendants, Jaquez Collins and Ockeion Perry, knowingly transferred and possessed, and aided and abetted in the transfer and possession of, a machinegun conversion device, also known as a "Glock switch," a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 922(o)(1) and 2.

COUNT TWO
Illegal Possession of a Machinegun
18 U.S.C. § 922(o)(1)

D-2 Ockeion D. Perry

2. From on or about October 10, 2023, to on or about October 13, 2023, in the Eastern District of Michigan, Ockeion Perry knowingly possessed a machinegun conversion device, also known as a “drop-in auto sear,” a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o)(1).

COUNT THREE
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)(1)(A)

D-1 Jaquez Collins

3. On or about December 13, 2023, in the Eastern District of Michigan, Jaquez Collins knowingly possessed a firearm, that is, a Smith & Wesson, M&P, .40 caliber, semi-automatic pistol, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine as alleged in Count Four of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR
Possession with Intent to Distribute Cocaine
21 U.S.C. § 841(a)(1)

D-1 Jaquez Collins

4. On or about December 13, 2023, in the Eastern District of Michigan, Jaquez Collins knowingly possessed with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATIONS
18 U.S.C. § 924(d) and 28 U.S.C. § 2461
21 U.S.C. § 853

5. The allegations contained in Counts Two, Three, and Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461, 18 U.S.C. § 924(d) and 28 U.S.C. § 2461, 21 U.S.C. § 853.

6. As a result of violating Title 21, United States Code, as set forth in this Indictment, Defendant shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations, pursuant to Title 21 United States Code, Section 853(a).

7. Upon conviction of the offense charged in Count Two of this Indictment, Defendant, Ockeion Perry, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461, any firearm or ammunition involved in said offense including but not limited to: one Diamondback Arms, model DB-15, .223 caliber semi-automatic firearm, s/n: DB2906391, one automatic sear, and ammunition.

8. Upon conviction of the offense charged in Count Three of this Indictment, Defendant, Jacquez Collins, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461, any firearm or ammunition involved in said offense including but not limited to: Smith & Wesson, M&P, .40 caliber pistol, s/n: HNX0100, and ammunition.

9. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL
s/Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Anthony Vance

ANTHONY VANCE
Chief, Branch Offices

s/Blaine Longworth

BLAINE LONGSWORTH
Assistant United States Attorney

Dated: August 7, 2024

United States District Court Eastern District of Michigan	Criminal Case Cover
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Case: 4:24-cr-20436
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: BL

Case Title: USA v. Jaquez Collins, et al

County where offense occurred: Genesee

Offense Type: Felony

Indictment -- based upon prior complaint [Case number: 24-mj-30108]

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

August 7, 2024

Date

s/Blaine Longworth

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 Assistant United States Attorney
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 Bar #: P55984

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.